

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

RALPH S. JANVEY, IN HIS CAPACITY
AS COURT-APPOINTED RECEIVER
FOR THE STANFORD RECEIVERSHIP
ESTATE, AND THE OFFICIAL
STANFORD INVESTORS COMMITTEE

VS.

ADAMS & REESE, LLP, BREAZEALE,
SACHSE & WILSON, LLP, ROBERT
SCHMIDT, JAMES AUSTIN, CLAUDE F.
REYNAUD, JR., CORDELL HAYMON,
and THOMAS FRAZER

CIVIL ACTION NO.

3:12-CV-0495-N-BL

PLAINTIFFS' AND DEFENDANT CLAUDE REYNAUD'S
JOINT MOTION FOR A STAY OF THE PROCEEDINGS

Plaintiffs Ralph S. Janvey, in His Capacity as Court-Appointed Receiver for The Stanford Receivership Estate, and The Official Stanford Investors Committee (collectively “Plaintiffs”), and Defendant Claude F. Reynaud, Jr. (“Defendant”) file this Joint Motion for a Stay of the Proceedings, as follows:

1. The joint movants are aware that on December 14, 2015, this Court entered a Notice of Settlement and Stipulated Order Staying All Deadlines in the case in *Certain Underwriters at Lloyd's of London and Arch Specialty Insurance Co. v. Janvey*, Civil Action No. 3:09-cv-1736 (Doc. No. 133) (the “Lloyd’s Case”). Additionally, the movants are aware of a motion filed by Certain Underwriters at Lloyd’s of London and Arch Specialty Insurance Co. (collectively “Lloyd’s”) on December 15, 2015 (Doc. 134) in the Lloyd’s Case to enforce what the Lloyd’s motion contends is a settlement between Lloyd’s and the

Receiver, which, if granted, and the settlement terms approved by the court, would impact the resolution of the claims Plaintiffs assert against Reynaud in this Lawsuit.

2. While the Lloyd's Motion to Enforce is being determined and/or Lloyd's and the Receiver continue to work toward a resolution, it is in the best interest of the parties and in the interest of judicial economy that all deadlines, including trial deadlines, in this Lawsuit be stayed until further order of this Court.
3. A district court has the inherent power to control its own docket, including the power to stay proceedings before it. See *Clinton v. Jones*, 520 U.S. 681, 706, 117 S. Ct. 1636, 137 L. Ed. 2d 945 (1997) ("The District Court has broad discretion to stay proceedings as an incident to its power to control its own docket."). How to best manage the court's docket "calls for the exercise of judgment, which must weigh competing interests and maintain an even balance." *Landis v. N. Am. Co.*, 299 U.S. 248, 254-55, 57 S. Ct. 163, 81 L. Ed. 153 (1936); *Gonzalez v. Infostream Grp., Inc.*, No. 2:14-cv-906 (E.D. Tex. Mar. 2, 2015).
4. Judicial and party resources will be saved by staying this litigation pending determination of the Lloyd's Motion to Enforce and the effect, if any, such determination will have on the resolution of the claims in this case.
5. Further, the movants agree that the prejudice, if any, from a short delay in the case will clearly be outweighed by the benefit of judicial efficiency.
6. Accordingly, the movants jointly and respectfully request that this Court grant this Motion to Stay this action until the Court determines Lloyd's Motion to Enforce Settlement in Civil Action No. 3:09-cv-1736.

Dated: January 11, 2016.

Respectfully submitted,

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CERTIFICATE OF SERVICE

On January 11, 2016, I electronically submitted the foregoing document with the Clerk of the Court of the U.S. District Court, Northern District of Texas, using the electronic case filing (ECF) system of the Court. I hereby certify that I will serve all parties individually or through their counsel of record, electronically, or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Carrie Johnson Phaneuf
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